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December 20, 2011

**VIA FACSIMILE: 718-613-2365**

**VIA ECF**

Magistrate Judge Pollak  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Chambers Room 1230  
Brooklyn, New York 11201

Re: Carmen Maidana v. La Esquina Criolla  
Restaurant, Inc., EDNY Case No. 11 Civ.  
2606 (CBM)(CLP)

Dear Judge Pollak,

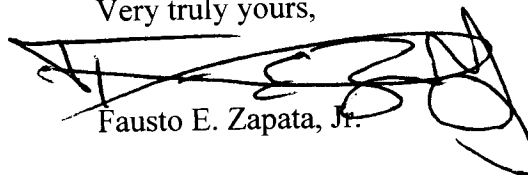
I am the attorney representing Plaintiff in the above-referenced matter.

I write to request a thirty (30) day extension of time of all discovery deadlines in the above-referenced matter. Our request for an extension is necessary because we did not receive Defendants' Responses to Plaintiff's First Request for the Production of Documents by December 15, 2011 as required by Your Honor's Order, dated November 30, 2011. We spoke with Defendants' counsel on December 14, 2011 at which time he stated that he would provide the responses as soon as possible.

Accordingly, upon receipt of said responses, we need time to review them as well as time to schedule and conduct the depositions. The current date by which the parties are required to complete depositions is January 31, 2011. Accordingly, we request an extension of time until March 1, 2011. This request is being made with Defendants' counsel's consent.

If you have any questions, please call me at 212-766-9870.

Very truly yours,



Fausto E. Zapata, Jr.

C: L. Echeverria  
File